

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

**MISSOURI PRIMATE FOUNDATION,
et al.,**

**Plaintiffs and
Counterclaim Defendants,**

v.

**PEOPLE FOR THE ETHICAL
TREATMENT OF ANIMALS, INC., et al.,**

**Defendants and
Counterclaim Plaintiffs.**

Case No. 4:16-cv-02163

DECLARATION OF JARED GOODMAN

Pursuant to 28 U.S.C. § 1746, I, Jared Goodman, declare the following to be true and correct to the best of my knowledge and belief:

1. I am counsel for Counterclaim Plaintiffs People for the Ethical Treatment of Animals, Inc. and Angela Scott (together, “Plaintiffs”). I make this declaration based upon my personal knowledge.

2. On December 1, 2021, at 10:00 a.m. Central Standard Time, I participated in a conference call with my co-counsel Jim Martin and Counterclaim Defendant Tonia Haddix to discuss whether Plaintiffs and Ms. Haddix could resolve their dispute regarding chimpanzee Tonka.

3. During this conference, I informed Ms. Haddix that Plaintiffs are in possession of Ms. Haddix’s own written acknowledgment from just last month that Tonka is alive.

4. In response to this assertion, Haddix went on a diatribe, explaining that when she finds out who provided Plaintiffs with that information, she is “going to beat their ass. Anybody who would ever betray me, I will get them.” She then asserted that she did not mean she would

physically harm them, but that she would conspire with others to put them “out there on social media and be one of the most hated people in the United States, trust me.” She further explained, “I will get them to send hate mail” and “to do all kinds of crazy. So let me tell you, it will be done.” Ms. Haddix continued, “If you think the animal industry will tolerate a spy, you’re out of your mind.”

5. Later that same day, Ms. Haddix emailed me a “discovery request for production of all documents, witness statements, any subpoenas sent or anything else relevant to this hearing.” This request appeared to be a transparent attempt to obtain the identity of the individual against whom Ms. Haddix assured she would coordinate a campaign of harassment and intimidation. In response to her request, I informed Ms. Haddix that the deadline for a request for production of documents had long passed. A true and correct copy of this correspondence is attached as **Exhibit A**.

I declare under the penalty of perjury that the foregoing is true and correct.

December 6, 2021

Tillamook, OR

/s/ Jared Goodman
Jared Goodman